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ORIGINAL

April 26, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, DC 20554

NOTICE OF EX PARTE  
**RECEIVED** COMMUNICATION

APR 26 2005

Re: CG Docket No. 02-278

Federal Communications Commission  
Office of Secretary

Dear Ms. Dortch:

On April 15, 2005, M. Gregory Smith, President and CEO of Accudata Technologies ("Accudata"), Jim Webber of QSI Consulting, Inc. and Albert Kramer and Robert Felgar of Dickstein Shapiro Morin & Oshinsky, met with Acting Bureau Chief Jay Keithley and Bureau Chief of Staff Erica McMahon, both of the Consumer and Governmental Affairs Bureau. We discussed the practice of certain local exchange carriers, including Verizon, of not querying caller name databases belonging to Accudata and other companies.

We apologize for any inconvenience the late filing of this ex parte may have caused any party.

Respectfully submitted,

*Albert H. Kramer* <sup>per</sup>

Albert H. Kramer

cc: Jay Keithley  
Erica McMahon

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List ABCDE



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M. Gregory Smith, President and CEO of Accudata  
Accudata Technologies  
206 W. McDermott  
Allen, TX 75013

April 15, 2005



# TABLE OF CONTENTS

## TABLE OF CONTENTS

Accudata Power Point Presentation.....	1
FCC Discussion Document.....	2
2003 Line Count Data .....	3
Sprint CNAM Marketing Information.....	4
LEC Caller ID Marketing Information.....	5
Verizon Comments in Telemarketing Proceeding .....	6
Public Notice Example .....	7





## Calling Name (CNAM) Database Services

Presentation to the Federal Communications Commission

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M. Gregory Smith, President and CEO of Accudata  
Accudata Technologies  
206 W. McDermott  
Allen, TX 75013

# What Is A Calling Name (CNAM) Service?

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- Displays the calling party's name on the called party's telephone viewer
- An essential component of caller ID service
- The called party pays for its LEC caller ID service
- The CNAM service is a necessary component of telemarketer compliance with the telemarketing rules.  
*See 47 C.F.R. § 64.1601(e)(1)*

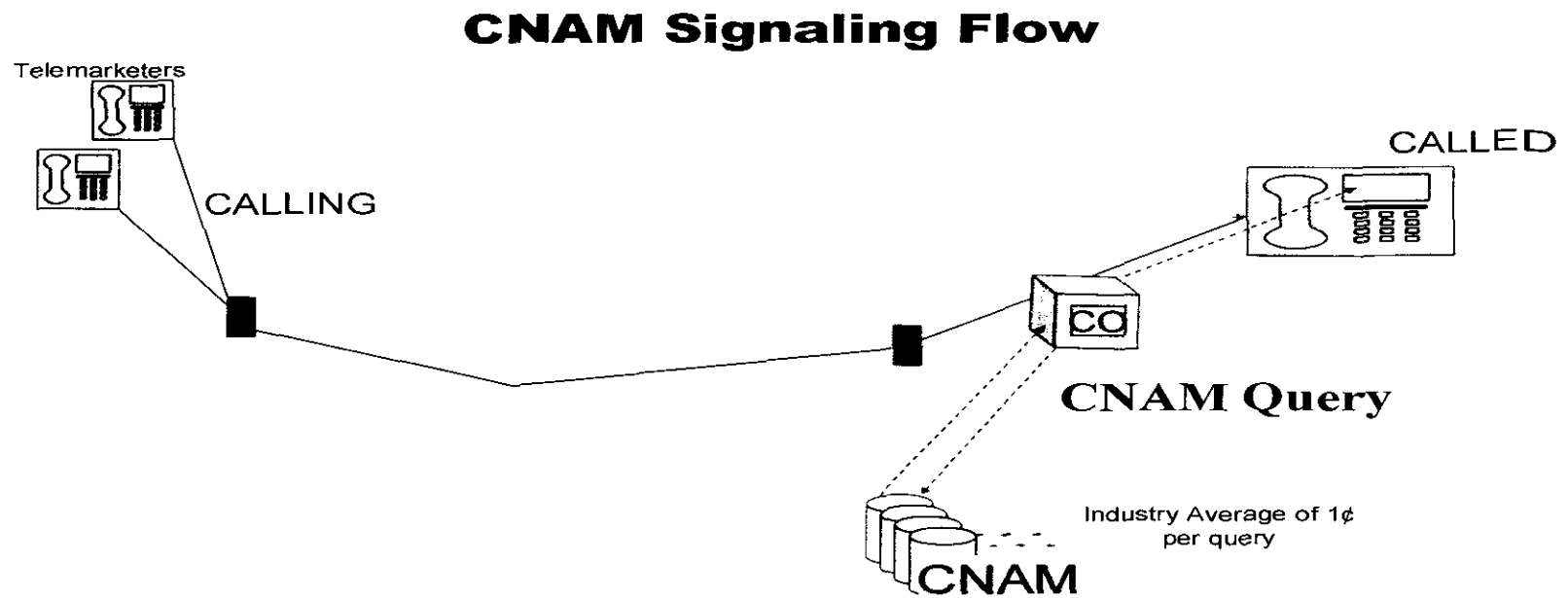
# How CNAM Works

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- When an end office switch receives a terminating call, the switch determines whether the following criteria are satisfied:
  - the terminating subscriber has activated Caller ID
  - the call is not marked as restricted
  - the calling party name is available
- If these three criteria are satisfied, the switch queries a database to determine the appropriate unique CNAM database to find the calling party name
- The query routes to the appropriate CNAM database, retrieves the calling party's name, and transmits it to the called party



# How CNAM Works (Cont'd.)



# CNAM Database Service Providers

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- The following is a list of companies, both LECs and independent, that provide the CNAM service

Verizon East-North/Nynex  
Verizon East-South/Bell Atlantic  
SBC/Ameritech  
BellSouth  
SBC/SWBell  
Qwest/USWest  
SBC/PacBell  
SBC/SNET  
TSI Telecom Services (Syniverse)\*

Teeny Weeny  
Verizon West/GTE  
Verisign/Illuminet\*  
Sprint United  
Iowa Network Services  
Accudata/Revcom\*  
Cincinnati Bell  
IDN, LLC  
Salina Spavinaw Telephone  
Alltel

\* Non-LECs offering CNAM service

## CNAM Database Service Providers (Cont'd.)

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- ILECs generally store their own CNAM information
- Independent database providers provide a place for CLECs to store their subscribers' CNAM data

# The Money Flow

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- The terminating LEC typically pays the database provider for each CNAM query
- The average charge for a CNAM query is approximately \$.01
- The database provider typically shares revenue with its customers

## About Accudata

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- Accudata has been a competitive database provider since 1998 and has offered a CNAM service since 1999
- Accudata predominantly serves CLECs

# The Problem

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- The LECs serving called parties are not always querying the CNAM database. This impacts many groups
  - Consumers
  - CNAM Providers
  - CLECs
  - Charities and Telemarketers

# Impact Of Failure Of LECs To Query CNAM Database

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- Consumers and Customers:
  - ILECs' customers, who are paying more than \$7 per month for caller ID services, are not getting what they paid for
  - Called parties are denied control over incoming calls
    - Lose their ability to avoid annoying telemarketing calls
    - Lose ability to respond to desired callers

# Impact Of Failure Of LECs To Query CNAM Database (Cont'd.)

---

- CNAM Providers
  - Loss of customers and significantly reduced ability to grow
- CLECs and VoIP Providers
  - CLECs and VoIP providers have fewer choices of effective CNAM providers
- Charities and Telemarketers
  - Ability of charitable organizations to raise money through telemarketing is weakened



# ILECs' Refusal To Query CNAM Databases Violates Telemarketing Rules

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- The refusal violates Commission Rule 47 C.F.R. § 64.1601(e)(1), which requires that a telemarketer's name be transmitted to the called party "when [made] available by the telemarketer's carrier"

Any person or entity that engages in telemarketing . . .  
must transmit caller identification information.

(1) For purposes of this paragraph, caller  
identification information must include either CPN  
or ANI, and, when available by the telemarketer's  
carrier, the name of the telemarketer.

47 C.F.R. § 64.1601(e)(1)

# ILECs' Refusal To Query CNAM Databases Is Unjust And Unreasonable And It Violates Section 201 Of Act

---

- ILECs' customers are not receiving the caller ID service for which they are paying
- Undermines FCC policy of putting consumers in control of incoming calls

## ILECs' Refusal To Query CNAM Databases Is Unjust And Unreasonable And It Violates Section 201 Of Act (Cont'd.)

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- Undermines FCC determination that the market for call-related databases can function efficiently. *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Report and Order and Order on Remand, 18 FCC Rcd 16978, 17330-31 (2003)
- Undermines ability of legitimate charitable organizations to raise money through telemarketing

# Possible Remedies

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- Informal Channels
- Public Notice
- Rule Interpretation
- Other



## Discussion Document for the Federal Communications Commission

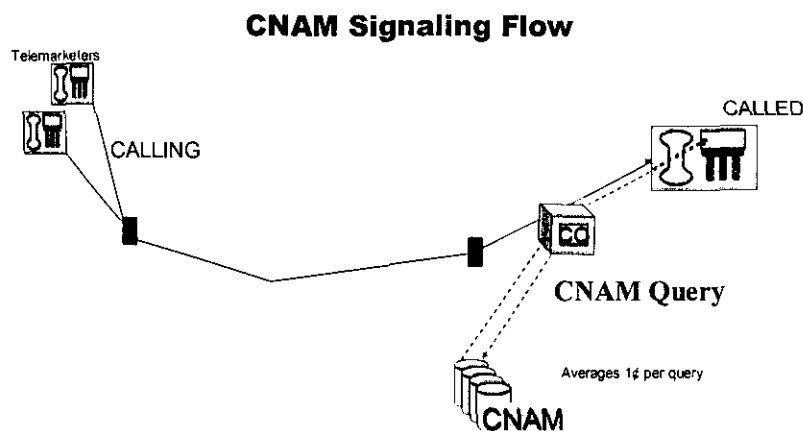
April 15, 2005

**Purpose:** The purpose of this document is to bring to the attention of federal officials important issues in the telecommunications field relating to Calling Name (CNAM) display (or Caller ID) and the general non-conformity in the industry relative to:

- A: Consumer receipt of CNAM (Caller ID) when purchased as a feature (or bundled with other features) from their local exchange carrier (LEC), and
- B: Telemarketer names not being displayed on the called party's telephone solely due to a carrier's decision not to provide the name.

**Over 66% of the industry is non-conforming.**

**Industry Background:** Calling Name displayed on a consumer's telephone is widely misunderstood as being the responsibility and result of the CALLING party sending the name for display. In fact, names are displayed as a result of the CALLED party's local carrier retrieving the name from a series of industry databases as outlined below.



The CNAM databases shown above are made up of unique information owned by the LECs and a few independent companies. Telephone numbers are stored in these databases with a display name which is used for Caller ID. Subscribers may indicate a desire for the name to never be displayed, in which case it is not sent to the telephone of the called party even if that party subscribes to "Caller ID" from their carrier (though this clearly is not allowed by telemarketing firms).

Below are lists of the CNAM Databases storing in North America.

Calling Name (CNAM)	
<b>CNARG - SCCC Billing</b>	
DB Name	
Verizon East-North/Nynex	
Verizon East-South/Bell Atlantic	
SBC/Ameritech	
Bell South	
SBC/SWBell	
Qwest/USWest	
SBC/PacBell	
SBC/SNET	
TSI Telecom Services (Syniverse)*	
Teeny Weeny	
Verizon West/GTE	
Verisign/Illuminet*	
Sprint United	
Iowa Network Services	
Accudata/Revcom*	
Cincinnati Bell	
IDN, LLC	
Salina Spavinaw Telephone	
Alltel	

\* Non-Local Exchange Carriers offering storing services.

The organizations on these lists hold nearly 99.99% (See Attachment A for percentages of lines owned) of the names and numbers in the United States commonly referred to as landline or Public Switched Telephone Network (PSTN) numbers (plus some wireless numbers and names). Sending a query to these databases will result in a name being displayed with a very high degree of success and accuracy.

The database owners are generally compensated for managing these databases by charging a per query or per "dip" fee when others query their database. These are not tariffed services, but contracted. The cost per query ranges from free (often referred to a "bill-and-keep" arrangement where two database owners have entered in to an agreement not to charge each other) to a high of \$0.020 from one small database owner. Most charge \$0.0160 per query, and the average charge is about \$0.010. In rare instances, these database owners charge other telephone companies to store their data in the database. Obviously there is no charge when they query their own data.

**Problem A:** From a consumer perspective, a telephone subscriber is charged a fee, either bundled with other services or as a separate fee for the privilege of having a calling name

displayed on their telephone. An industry normal fee per line is about \$7.90 per month. For this, the expectation is that every time the consumer receives a call, a name will be displayed unless;

1. The caller blocks the call either by instruction to their telephone provider to never send their name or by special codes stopping the display on a per call basis, or,
2. The subscriber's telephone company decides not to send a query to get the name, or,
3. In rare instances, the name is simply impossible to get because it is not stored or there are technical difficulties.

The issue being addressed here is number 2 – the called party's local exchange carrier simply makes a decision not to query for the name. There is no technical reason for this; only financial. But, the subscriber is denied what they paid for - a Calling Name being displayed (See Attachments B-E for examples of marketing literature from the major carriers for this service. None indicate they reserve the right to solely decide when and if they will return the name.).

Some telephone numbers where the subscriber has officially complained include:

972-517-3639 and 214-607-1836

**Solution to A:** The FCC send a simple memorandum (see draft example at Attachment H) to the local exchange carrier organizations who provide Caller ID instructing them that it has been brought to their attention that there may be fraudulent activity surrounding their sale of Caller ID (Calling Name) display to their consumers. It is directed that they review their policies and if they find that they are not providing all available, accurate Calling Names to their subscribers who purchased that service; they immediately correct the situation by querying the appropriate databases. A response is requested back signifying their compliance with this memorandum within 30 days.

**Problem B:** Several directives/guidelines (Federal Trade Commission's Telemarketing Sales Rule (TSR) and the FCC 47CFR number 64.1602) have been issued by both the FTC and the FCC relating to this Calling Name issue concerning telemarketing firms. The clear intent is that these federal agencies wish the name of telemarketing firms to be displayed on consumer's telephones when a consumer has opted for the Caller ID/Calling Name Display feature.

Though the directives are not technically exactly correct (telemarketing firms do not "send" their name as shown in the diagram and information above), telemarketing firms must store their data with a recognized CNAM storing company – one on the list above. And the local exchange carrier providing service to the consumer MUST query for the name on every call. This may be the only way the FCC can expect compliance with their intent.

**Solution to B:** This is virtually the same simple solution as A. Send a memorandum to local exchange carriers indicating your expectation that they immediately begin querying



the appropriate databases for every call received by one of their subscribers who has purchased the Calling Name/Caller ID feature.

**Summary:** These are simple problems with simple solutions. Carriers who are not complying can certainly be considered guilty of fraudulent behavior and additionally precluding the intent of federal agencies' directives relating to telemarketing firms. It is known with certainty that companies like Verizon and SBC do not comply with the appropriate industry practices. They are simply reducing their operating costs while other companies seem to generally comply and, therefore, do not avail themselves of the reduced operating costs. It is envisioned that the total of the highest cost to one of the non-complying local exchange carriers would be in the order of \$1 to \$2 Million per year. This is a small price to pay to provide consumers with a service they pay for each month, to avoid this fraudulent activity, and to insure compliance with federal expectations relative to telemarketing firms.

Thank you for your time and consideration. For any questions or further information, please contact:



**M. Gregory Smith**  
**President & CEO**

**Accudata Technologies**

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C: 214-676-1106

[gregs@accudatatech.com](mailto:gregs@accudatatech.com)

[www.accudatatech.com](http://www.accudatatech.com)



	Bell South	SBC SWBT Pac Ameri SNET Qwest	Verizon NY/NE NJ/PA other West	Sprint	other
	41,249	27,199 32,587 9,951 3,631 21,813	19,770 9,960 7,244 2,425	4,945	1,346
		6,639	9,941 8,449 3,444	866	1,155
		5,728	5,904 5,737 2,747	1,279	2,882
		3,109	5,612 2,043	739	6,556
		3,018	260	907	331
			1,074	573	317
			957	400	595
			861	240	336
				438	644
				268	300
					378
					315
					256
					298
					406
					219
					292
Tot	41,249	27,199 32,587 28,445 3,631 21,813	35,615 32,910 15,478 2,425	10,655	16,626
	15.36%	10.12% 12.13% 10.59% 1.35% 8.12%	13.26% 12.25% 5.76% 0.90%	3.97%	6.19%
	SBC	91,862	Verizon 86,428		
		34.20%	32.17%		
	Bell South=	15.4%	Total	268,633	
	SWBT=	10.1%			
	Ameritech=	10.6%			
	Verizon=	32.2%			
	SNET=	1.4%			
	Sprint=	4.0%			
	PacBell=	12.1%			
	Other=	6.2%			
	Qwest=	8.1%			
		100.0%			





## Calling Name Data Storage

[Back to Products & Solutions](#)

### Overview

Sprint's Calling Name (CNAM) Data Storage service helps you generate new revenue by making your end-user customers' names available to companies that provide Caller ID with Name service to their end users. When you store your customers' names in Sprint's CNAM database, service providers who provide calling name will pay for access to your end-user customers' names so they can provide Caller ID service for their end users. Your end-user customers' names are secured in a single, national, proprietary database and can only be used to provision Caller ID.

With Sprint's CNAM Data Storage service, you may:

- Increase your revenue.
- Increase your end users' customer satisfaction.

### Features & Benefits

- High-margin revenue, month after month. You don't have to invest in capital equipment, operating support, or securing agreements needed to earn query revenue from database dips by other service providers - increases revenue and saves on expenditures.
- No cost for name storage or setup charges - saves on expenditures.
- Responsive data administration - means daily or weekly data updates can be received electronically through PC file transfers or mainframe-to-mainframe using connect direct. Once you get started, the product runs with minimum of ongoing maintenance.
- Sprint performs emergency updates over the phone, and typically processes regular update information within 24 hours of receipt - provides you with the most accurate and up-to-date information available.
- Sprint's CNAM database fully meets industry standards for queries-per-second and storage volumes - provides high capacity and reliability. And, high up-time means higher revenue for you.
- Sprint's CNAM database operates in conjunction with Sprint's Line Information Database (LIDB) - consolidates LIDB and CNAM maintenance. Updates to both are sent at the same time through a single interface, rather than duplicating efforts by updating each database separately.

### Product Details

Sprint's Calling Name (CNAM) Data Storage service is simply a database for telephone numbers and the associated end-user names. The information is secured in a single, national, proprietary database and can only be used to provision Caller ID.

When an end user calls a Caller ID service subscriber, the terminating LEC initiates a CCS/SS7 message containing the calling number to the database where the caller's calling name is stored. The caller's name is sent to the requesting LEC, who pays Sprint per query for access to the information. Sprint, in turn, shares that revenue with you. Because Sprint has calling name access agreements with most large domestic telephone companies, your end users' names will be accessed more frequently.

Here is how it works:

Wireless or  
wireline caller  
initiates a call  
to called party

Originating  
telephone  
company switch

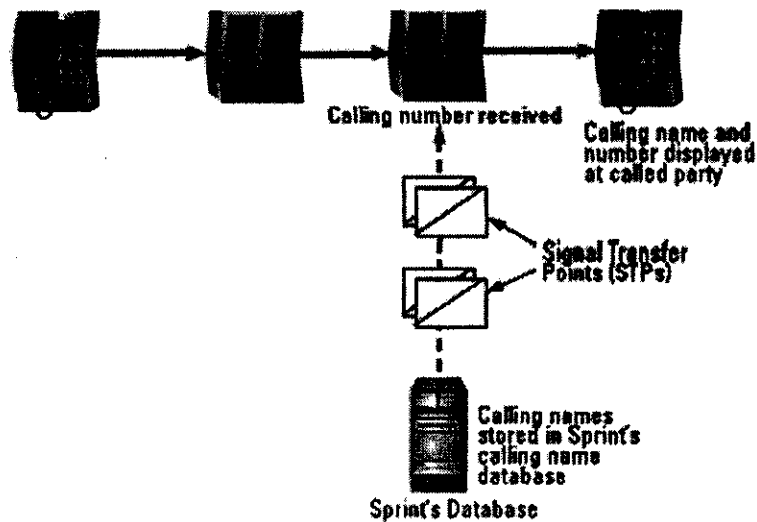
Terminating  
telephone  
company switch

### CLEC Forum

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Forums](#)

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### Business Applications

- Increases your minute-driven revenue since more calls are answered when the caller's name is recognized.
- Leverages your end-users' names into ongoing monthly revenue with per-query revenue gained from accesses to the calling name (CNAM) database.
- Controls the ability to identify callers by name so your end-user customer can determine the priority of each in-coming call and choose whether or not to answer it.

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March 16, 2005

Dear Valued Customer:

We are very happy to have you as a Verizon customer. Your satisfaction is important to us and we wanted to respond right away.

This letter confirms:

- o service(s) you recently ordered
- o standard monthly rates for each service (any discounts will appear on your bill)
- o any service connection charges
- o your order number

All monthly service charges are billed one month in advance. For all services and packages, your first bill may show a partial month charge (which includes charges as of the day of the service or package was installed up to the first billing date). If the first bill you receive includes a partial month charge, the bill may be higher than a normal one-month bill. If applicable, charges for connecting or changing other services usually appear on the first bill. If this letter does not accurately reflect the service you ordered or if you have any questions, please contact your local business office.

You can reach us by calling toll-free at 1-800-483-4400.

Our business office hours are 8:00 AM to 6:00 PM Monday - Friday. If you should need to reach Repair, please call 1-800-483-1000 any time. You can

~~WALTER C. GILSON~~  
~~7406 BRUCKENRIDGE DR~~  
~~PLANO, TX 75075-2680~~

B-1

THIS IS NOT A BILL / ESTO NO ES UNA FACTURA

04968 1640 160342 026291





## Important User Instructions

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Page 4

Here are the instructions for using your Calling Service(s). Please keep this document in a convenient place near your telephone.

### **\*77 - Anonymous Call Block**

Allows you to block calls from anyone who uses Complete Blocking (Per Line or Selective Blocking) per call. The blocked calls will be routed to a message that instructs them to hang up, remove their blocking and call again.

#### **To Turn ON:**

1. Lift the handset and listen for dial tone.
2. Press \* 7 7.
3. A recording or confirmation tone will tell you that your Anonymous Call Block is ON.

#### **To Turn OFF:**

1. Lift the handset and listen for dial tone.
2. Press \* 8 7.
3. A recording or confirmation tone will tell you that your Anonymous Call Block is OFF.

### **Caller ID - Number Only, or Caller ID**

Caller ID - Number Only, or Caller ID lets you see the number of the person calling you. In addition, the date and time of day each call was received may be displayed. The information will be displayed on a display device between the first and second rings.

Caller ID display devices vary in design, available features, and the amount

B-2

THIS IS NOT A BILL / ESTO NO ES UNA FACTURA



## Important User Instructions

Page 5

of numbers that may be retained in memory.

- o Caller ID - Number Only, or Caller ID will display number or names and numbers of calls from within your defined calling area and may also display long distance numbers. Some calls may be shown as "Out-of-Area" or as "Private Number", and the number will not be displayed.

### Notes About The Display Device:

- o A Caller ID display device is an additional piece of equipment that is required for this service. More information is available on the rental or purchase of display devices through your local Customer Contact Center, Verizon Plus, other retail stores, or direct mail retailers.
- o The display unit must hear one ring before it can receive a number to display.

### \*67 Selective Blocking - Per Call (Per Call Blocking)

Areas that have Caller ID also provide you the capability of preventing your telephone number from being displayed on Caller ID equipment.

### To Block The Display of Your Number:

1. Lift the handset and listen for dial tone.
2. Press \* 6 7.
3. Listen for the confirmation tone, followed by dial tone.
4. Place the call and your number will NOT be displayed, one call at a time.

### Notes About The Service:

HOWEVER, THIS WILL NOT PREVENT YOUR TELEPHONE NUMBER FROM DISPLAYING

B-3

THIS IS NOT A BILL / ESTO NO ES UNA FACTURA

04968 1640 160342 026295

verizon

verizon.com

Residential

Business

Site Search ▾

For Your Home

Verizon Freedom

Long Distance


Calling Plans

Calling Features

View All Products

## Caller ID with Anonymous Call Block

Monthly Fee: \$7.95

 add to cart

Know who's calling before you pick up the phone.

Caller ID lets you see the names and telephone numbers\* of incoming calls on a small display unit or display phone, and provides a convenient way to manage and track all your incoming calls.

- You'll see the names and numbers of your callers, so you can decide whether to take the call now or return the call later.
- You can store the names, numbers, dates and times of calls, even if callers hang up or don't leave a message.



\*The name and/or number of your caller may not be displayed for every incoming call. In some cases, you will see a message on your Caller ID display unit instead of the name and number of the caller. The exact wording of the message may vary depending upon your display unit. "Out of Area" or "Unavailable" messages are from calls made outside specially equipped areas and calls made through an operator. "Private" or "Anonymous" messages are from calls made by people who have blocked the display of their telephone information.

You can block "Private" or "Anonymous" calls by activating Anonymous Call Block (ACB). This service is included at no additional charge, with your Caller ID service.

 back  add to cart

All features are subject to availability and compatibility restrictions. Additional charges may apply.

A special Caller ID display device is required and may be purchased from Verizon TeleProducts or a local retailer of your choice. For information on Caller ID equipment, call 800-822-0409 or visit [www22.verizon.com/pages/phones](http://www22.verizon.com/pages/phones).

Pricing information is based upon the state or area code and telephone number you provided. Ranges of prices are offered for some products, and additional charges may apply. Pricing may not reflect current promotional pricing. In the event of a discrepancy between the information contained here and the applicable tariff, the tariff terms shall prevail. If pricing information is not available, [contact Verizon](#) for more details. Detailed pricing information will be available when you place your order.

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### Service Location

Texas

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### Product Recommender

Find products and services that best meet your needs.

[Get started](#)

### Resources

- ▣ [Product Instructions](#)
- ▣ [Frequently Asked Questions](#)

B-4



**Customer Support**

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[Refine Search](#)

**Sign-up and Save!**  
Update your profile or register for exclusive offers and helpful tips from SBC.

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**Consumer Protection**  
Tips to protect yourself  
against potential Internet  
fraud.

## Caller ID with Name

See who's calling before you answer. You're in control.

SBC Caller ID records, the date, time, and number for you.

Phone rings. You answer. Or don't. You choose.

Never answer an unwanted call again.

### Overview

Caller ID with Name\* lets you know who's calling before you pick up the phone, so you can decide which calls to answer and which to return later. If you decide to return a call, just look at your Caller ID display for a quick reference on the caller's name, number, and time of call.

\*Caller ID with Name may not be available in all areas or on all calls.

### Features and Benefits

**Instantly Know Who's Calling** — Caller ID with Name displays the caller's name and number after the first ring, so you can decide instantly whether or not to answer.

**Saves Call Information** — Caller ID with Name saves names, numbers, dates, and times of incoming calls. It makes returning calls simple.

**Time Saving** — Your time is valuable. If you know who's trying to reach you, you can determine if the call is important or not. You'll avoid the hassle of unwanted callers and spend your time doing what you want to do.

### Set Up

Set up your Caller ID display equipment or phone equipped with Caller ID according to the manufacturer's instructions provided with the unit. You can purchase or rent a variety of Caller ID equipment at SBC.com. You may also call our Customer Service Center for assistance.

### Display

**Name and Number** — Caller ID with Name shows the caller's name and number. Most display units also show the time and date of the call.

**Out of Area** — "Out of Area" indicates a call is from an area that doesn't have Caller ID technology, or the call is being switched through machinery not equipped with Caller ID technology.

**Private** — If you see "Private," "Blocked," or "Anonymous" displayed, it means the caller is deliberately blocking Caller ID with Name.

**Error** — "Error" or "E" means the display unit or phone cannot identify the caller's phone number. If you get this message often, call a local repair service which can be found in your neighborhood white pages. For information on managing these types of calls, see our companion product Privacy Manager®.

[Log In](#)

[MySBC](#)


[Register](#)

[Ask a Question](#)

(Example: Is my bill?)

[Question](#)

C


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[MANAGE MY ACCOUNT](#)
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## Consumer

- Consumer Home
- The Neighborhood Calling Packages
- Features & Benefits
- Plans, Pricing & Sign Up
- FAQs
- Local & Long Distance Plans
- High Speed Internet
- International Plans
- Rewards Programs
- Prepaid Calling Cards
- All Consumer Products
- Manage My Account
- Check Voicemail
- Customer Service
- Productos en Español

**FOR MORE INFORMATION**  
CALL 1-877-777-8271

### The Neighborhood Calling Packages

## Features & Benefits

Whether you want the freedom of unlimited calling or just the minutes you need, The Neighborhood has a plan that will suit you perfectly. Our two most popular plans are **Neighborhood Complete** and **Neighborhood 200**.

[JOIN NOW](#)

### Neighborhood Complete

#### Unlimited Long Distance Calls

- Call anyone, anywhere in the U.S. — includes all state-to-state and in-state long distance calls — any time, any day of the week

#### Unlimited Local Toll Calls

- Make as many regional /local toll calls to nearby towns or counties as you want

#### Unlimited Local Calls

- Make as many calls as you want, and talk for as long as you wish, inside your local calling area

#### Call Waiting, Caller ID, Speed Dial 8, and Three-Way Calling

- Never miss an important call with Call Waiting
- Find out who's calling before you answer with Caller ID
- Save time dialing the numbers you call most with Speed Dial
- Get several people together on the line at one time with Three-Way Calling
- No extra charge for these features

#### Voicemail & Online Message Center

- Check your voicemail messages by phone or on the Web
- "Notify Me" feature alerts you to new messages via text pager or e-mail
- Add up to 8 sub-mailboxes to your Voicemail

#### Low Rate Calling Card


- Makes it easy to call anywhere across the country when you're away from home

#### One Company, One Bill

- Get your local and long distance service and calling features through The Neighborhood with one easy-to-read bill

**High speed Internet is available for as low as \$19.99 a month (where available)\***

- Always On**  
With high speed Internet you're always connected, just turn on your computer and go.



D-1


The  
**Neighborhood**

built by 3423

## Online Account Manager

### Your Information

**BEVERLY WRIGHT**  
2995 CROSLY DR W  
UNIT F  
WEST PALM BEACH  
FL 33415-8442  
(561) 649-6203  
Account: 4KG29469  
gregg  
@accudatatech.com

 **E-mail Customer Service.** Ask a question and receive a response within 8 hours.

### Additional Local Calling Features

- |  |             |
|--|-------------|
| <input type="checkbox"/> <b>VOICEMAIL</b>  | \$6.00      |
| Voicemail lets you manage your calls when you're away from home, the office, on the other line or using the Internet. Plus you can check messages by phone or on the Web, and the "Notify Me" feature alerts you via pager or e-mail every time a new message arrives in your inbox. |             |
| <input type="checkbox"/> <b>VOICEMAIL SUB-MAILBOXES</b>  | \$0.50/each |
| <input checked="" type="checkbox"/> Select quantity of sub-mailboxes<br>Allows you to store separate incoming messages for different members of your household.  |             |
| <input type="checkbox"/> <b>CALL WAITING ID</b>  | \$5.50      |
| Know the name and number of the person beeping in with Call Waiting ID*  |             |
| * Additional calling features required with Call Waiting ID Name and Number. Required features vary by state.  |             |
| <input type="checkbox"/> <b>CALLER ID WITH NAME AND NUMBER</b>   | \$7.95      |
| Caller ID with Name and Number* shows you the name and number of callers before you answer the phone.  |             |
| * In some states, customers are required to select Caller ID Number Only with Caller ID Name and Number.   |             |
| <input type="checkbox"/> <b>CALL WAITING</b>   | \$5.50      |
| Call Waiting lets you receive other incoming calls when you're already on the phone. Never miss an important call again!   |             |
| <input type="checkbox"/> <b>WIRESOLUTION</b>   | \$4.00      |
| The Wire Maintenance plan covers repair charges for every phone jack and inside wiring on your phone line.   |             |
| <input type="checkbox"/> <b>PHONEGUARD</b>   | \$4.00      |
| PhoneGuard is an extended service plan for your telephone equipment that covers the cost of replacing expensive telephones in your home.   |             |
| <input type="checkbox"/> <b>WIRESOLUTION WITH PHONEGUARD</b>   | \$7.00      |
| Protect yourself from repair cost and telephone equipment cost by combining WireSolution and PhoneGuard at a discount.   |             |
| <input type="checkbox"/> <b>THREE-WAY CALLING</b>  | \$5.00      |
| Three-Way Calling lets you get several people together on the line at one time. You can add a third line to any established call for a three-line conference.  |             |
| <input type="checkbox"/> <b>CALL RETURN (*69)</b>  | \$5.00      |
| Call Return enables you to retrieve the telephone number of your last incoming call and have the option to call back.  |             |
| <input type="checkbox"/> <b>REPEAT DIALING (*66)</b>   | \$4.00      |
| Repeat Dialing lets you automatically keep redialing a busy number for up to 30 minutes.   |             |
| <input type="checkbox"/> <b>CALL FORWARDING</b>  | \$4.00      |
| Call Forwarding allows you to route your calls to the number you specify.  |             |

If you previously deselected a feature from your MCI plan and would like to reselect that feature now, there are no monthly fees or charges associated.

If you would like to add any additional features not listed above, please contact MCI Customer Service at 1-888-MCI-LOCAL (1-888-624-5622) for Residential customers or 1-800-438-4444 for Business customers.

D-2

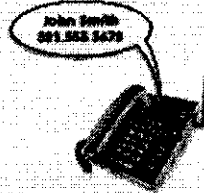
**To Print:** [Click Here](#) or Select **File** and then **Print** from your Browser's menu.

## Caller ID with Name and Number Delivery

### >> Know who's calling before you answer!

#### **Caller ID with Name and Number Delivery**

**\$7.95** per month if purchased separately; **NO CHARGE** with the Complete Choice® plan [pricing details](#)



See the caller's name\* and number after one ring. Most Caller ID units\*\* will also display the time and date of the call. If callers have privacy features that prevent their names and numbers from being identified, Anonymous Call Rejection identifies these callers and routes them to a recorded message.

- Identify callers and decide whether or not to answer
- Screen calls without an answering machine
- Avoid annoying or harassing calls

\*For selected calls received from outside the BellSouth nine state region, the calling party's name may be replaced with the city and state.

\*\*Requires compatible display unit

[how to order](#)

### **Description and Features**

BellSouth Caller ID with Name and Number Delivery lets you identify everyone who calls you, except callers using privacy features.

If a caller has privacy features that prevent their names and numbers from being identified, Anonymous Call Rejection identifies these callers and routes them to a recorded message.

The message tells callers they must disable the privacy feature in order to reach you. And, your phone doesn't ring until they do just that.

- BellSouth Caller ID with Name and Number Delivery includes Anonymous Call Rejection.

This feature is included with [BellSouth® Complete Choice®](#) at no extra charge.

To make the most of Caller ID add [Privacy Director](#) and stop "unknown", "unavailable" callers before your phone even rings.

[Frequently Asked Questions About BellSouth® Products and Services](#)

### **Benefits and Applications**

- Identify Your Callers - Alerts you to the source of annoying or harassing

E





**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Rules and Regulations Implementing the  
Telephone Consumer Protection Act of 1991

CG Docket No. 02-278

CC Docket No. 92-90

**COMMENTS OF VERIZON**

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Dated: December 9, 2002

## TABLE OF CONTENTS

Summary .....	1
I. Do-Not-Call Lists Are an Effective Tool To Empower Consumers .....	2
A. The Commission Should Retain Company-Specific Do-Not-Call Lists. ....	3
B. The Commission Should Replace the Patchwork of State Do-Not-Call Rules with a Coherent National System. ....	6
1. One national list is better than dozens of lists .....	7
2. Establishment of a national list requires preemption of separate state lists. ....	8
3. There should not be two federal DNC regimes. ....	11
4. The Commission should build on the existing state lists in implementing its own system. ....	11
5. DNC systems must recognize and accommodate established business relationships. ....	12
6. Section 222 and section 227 are easily accommodated. ....	16
II. Technology Can Help Protect Consumer Privacy, and It Should Not Be Thwarted by New Serving Arrangements. ....	16
A. Calling-Party-Number-Based Capabilities Can Help Put Consumers in Control. ....	16
B. The Commission Should Ensure That Telemarketers Do Not Interfere with These Capabilities. ....	18
C. The Commission Should Ensure That Technological Changes Do Not Diminish These Protections. ....	18
III. Other Issues Raised in the Notice .....	19
A. "Wireless Numbers" .....	19
B. Autodialers and Predictive Dialers .....	22
C. Enforcement .....	24
Conclusion .....	26

6. Section 222 and section 227 are easily accommodated.

Sections 222 and 227 are easily accommodated. Any express request by an individual that a particular company not call her must be honored. The fact that the individual has given her agreement (express or implied) that the company may make use of her CPNI does not change that. Nor does the DNC request revoke or limit the permission to use CPNI, and the carrier may continue to market to the individual using means other than telemarketing.<sup>35</sup>

## **II. Technology Can Help Protect Consumer Privacy, and It Should Not Be Thwarted by New Serving Arrangements.**

The Notice seeks comment on developments in network technology and asks whether and how these technologies should influence the Commission's analysis of various DNC list proposals.<sup>36</sup> Technology can greatly assist consumers and supplement the protections afforded by DNC lists. Moreover, the Commission should prevent telemarketers from interfering with consumers' use of these technologies. Finally, the Commission must consider ways to ensure that technological changes do not diminish these consumer protections.

### **A. Calling-Party-Number-Based Capabilities Can Help Put Consumers in Control.**

The Commission is well aware of the value of Caller ID services in giving consumers control over their incoming calls. These services allow consumers to decline to answer calls from numbers they do not recognize. In 1992, the Commission found that the technology necessary for Caller ID was "costly to deploy" and was "not available to all telephone subscribers in all areas of the nation."<sup>37</sup> While Caller ID still might not be available literally everywhere, the technology is

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<sup>35</sup> See Notice ¶ 19.

<sup>36</sup> Notice ¶ 21.

<sup>37</sup> *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, 7 FCC Rcd 8752 ¶ 16 (1992).

far more widely deployed than it was a decade ago and is currently installed in Verizon end offices that serve 99 percent of its access lines, and close to 13 million residential customer subscribe to the service.

In addition, there are advanced intelligent network (AIN) services that use calling party number (CPN) to stop incoming calls before they even ring the consumer's telephone. Examples include Verizon's Anonymous Call Rejection and Call Intercept Services that block any calls on which the CPN is missing, invalid (in terms of the North American Numbering Plan) or marked private.<sup>38</sup> These services allow the consumer to design screening and blocking to meet her individual needs. Customer premises equipment that performs similar functions is also available.<sup>39</sup>

The Notice asks whether to require telemarketers to use a special area code or telephone number prefix that would allow consumers to block such calls in order to make it easier for consumers to use their CPN-based services or equipment to screen out telemarketing calls.<sup>40</sup> The Commission would have to consider whether a dedicated telemarketing NPA was a good use of numbering resources or whether a special telemarketing NXX is even possible in every NPA or every rate center where telemarketers are located and whether such an assignment would hasten

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<sup>38</sup> Anonymous Call Rejection Service simply blocks incoming calls when callers fail to identify themselves and is used by 10 million Verizon subscribers. More than one million consumers already use Verizon's Call Intercept service. The service screens such calls and allows users to decide if they want to receive calls from callers who say who they are. With Call Intercept, calls that have no CPN information are intercepted before the phone rings. Callers hear a message informing them that the subscriber does not accept unidentified calls and requests that they identify themselves by name or organization. If the caller records a message, Call Intercept rings the subscriber's phone and plays the message identifying the caller, at which point the subscriber may accept or decline the call, decline the call and ask to be added to the caller's do-not-call list, or send the call to voice mail.

<sup>39</sup> E.g., <http://www.privacycorps.com/products/>.

<sup>40</sup> Notice ¶ 21.

NPA exhaust (or even NANP exhaust). The Commission would also have to consider the costs to businesses to change to these new telephone numbers.

Some of these CPN-based capabilities also take advantage of the availability of DNC lists. For example, many types of CPE advise telemarketers to add the telephone number to the caller's DNC list.

These network services are not available everywhere, and the special CPE represents an added cost for consumers to protect their privacy. The Commission should not rely on these safeguards as a substitute for DNC lists.

**B. The Commission Should Ensure That Telemarketers Do Not Interfere with These Capabilities.**

The Notice asks whether the Commission should prohibit telemarketers from blocking CPN information.<sup>41</sup> The answer is that it should. CPN-blocking can defeat the purpose of the Caller ID services.

Moreover, the Commission should require that all telemarketers making telephone solicitations ensure with their telecommunications service providers that a valid, dialable CPN is delivered to the terminating local exchange carrier. Alternatively, these firms should be required to transmit a toll-free number that a consumer could call to be added to the DNC list of the soliciting firm.

**C. The Commission Should Ensure That Technological Changes Do Not Diminish These Protections.**

Consumers, or the services and equipment they use, can screen telemarketing calls only if they can identify them as such — or, at least, if they cannot identify them as calls that they do

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<sup>41</sup> Notice ¶ 26.





# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Nov 10 10 44 AM '04  
News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-635-6322

DA 04-3545  
November 8, 2004

## REMINDER OF CARRIER NOTIFICATION REQUIREMENTS IN THE PAYPHONE COMPENSATION RULES

CC DOCKET NO. 96-128

On October 22, 2004, the Commission released an *Order on Reconsideration* in this proceeding in which it clarified the requirements for how a local exchange carrier (LEC), interexchange carrier, or switch-based reseller carrier (SBR) notifies a payphone service provider (PSP) of the method by which the carrier will pay the PSP for payphone calls completed by the carrier.<sup>1</sup> Because the *Order on Reconsideration* clarified certain notification issues, we issue this public notice as a reminder that, consistent with the *Order on Reconsideration* in this proceeding, all carriers completing payphone calls ("Completing Carriers") must provide timely notification to PSPs of their chosen method of compensation.<sup>2</sup>

Under the payphone rules, a Completing Carrier may choose to compensate a PSP under one of two methods. First, the Completing Carrier may pay compensation by creating an audited call tracking and compensation system pursuant to the rules.<sup>3</sup> Second, the Completing Carrier may enter into a contract to pay compensation in a manner outside the purview of the rules.<sup>4</sup> These payphone compensation rules went into effect on July 1, 2004, at which time all Completing Carriers were required to notify their PSPs of the carrier's chosen payment method.<sup>5</sup>

If a Completing Carrier chooses to pay compensation by creating an audited call tracking and call compensation system, it must file a System Audit Report with the Commission by the

<sup>1</sup>Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order on Reconsideration, FCC 04-251 (rel. Oct. 22, 2004) (*Order on Reconsideration*).

<sup>2</sup> We note that this public notice reminding carriers of their obligations under our payphone rules does not by itself impose any new obligations.

<sup>3</sup>47 C.F.R. § 64.1310(a).

<sup>4</sup>*Order on Reconsideration*, para. 2.

<sup>5</sup>*Id.*

beginning of the payphone compensation quarter.<sup>6</sup> The *Order on Reconsideration* clarified that Completing Carriers may notify PSPs of these System Audit Reports by posting copies of them on their websites or on the website of a national payphone clearinghouse, and by including the web address of these websites in a filing with the Commission.<sup>7</sup> Carriers who chose this Internet method of notification would have been in compliance with the July 1, 2004 deadline.

Alternatively, if a Completing Carrier, such as an SBR, chooses to enter into a contract to pay a PSP outside the purview of the rules, the Completing Carrier must give the PSP adequate notice prior to the contract's effective date, with sufficient time for the PSP to object to the contract.<sup>8</sup> In an instance where an SBR enters into an agreement with an interexchange carrier by which the interexchange carrier will track payphone calls and pay payphone compensation on an SBR's behalf, the *Order on Reconsideration* clarified that advance notice of this agreement may be given to a PSP by directing the PSP to a website where the agreement is posted.<sup>9</sup> SBRs that choose to use this method of payment for payphone compensation quarters beginning on or after July 1, 2004 should ensure that notice of these agreements is provided to their PSPs, either by providing notice themselves or by contracting with their interexchange carriers to do so.

For further information regarding this public notice contact Darryl Cooper, Competition Policy Division, Wireline Competition Bureau, (202) 418-1580.

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<sup>6</sup>47 C.F.R. § 64.1320(b).

<sup>7</sup>*Order on Reconsideration*, para. 45, App. B (47 C.F.R. §§ 64.1320(b), (e)).

<sup>8</sup>*Id.* para. 15.

<sup>9</sup>*Id.*